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# ESH COORDINATORS' MEETING PAAA UPDATE

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Independent Oversight Office

May 22, 2003

# ESH Coordinator Meeting - May 22, 2003

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## ■ National Defense Authorization Act for FY2003

- Signed into law December 2, 2002
- Extends PAAA rules to 12/31/2004
- Requires new industrial health & safety regulations at DOE facilities indemnified under PAAA
  - Promulgation within 1 year (by 12/02/03)
  - Enforcement within 1 year of promulgation

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- Spring 2003 EFCOG PAAA Working Group Meeting – S. Sohinky OE
  - Industrial health & safety regulations being developed by Office of General Counsel (OG)
  - Rule will be distributed for comment
  - DOE Office of Price-Anderson Enforcement (OE) will enforce
  - Maximum fines: \$70k per day per event

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## ■ Enforcement

- Enforcement details unknown
- Self-reporting similar to PAAA
- Incentive for self-identification
- Focus will be on the more serious issues  
(willful, repetitive, serious injury, death)

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## ■ BNL Preparations/Actions

- Review & comment on draft regulations
- Gap analysis (procedures vs. regulation)
- Review DOE enforcement processes
- Modify internal procedures and R2A2s as necessary
- Establish PAAA lines of communication (IO and S & H Services Division)
- Expand PAAA Working Group
- ES&H Coordinators take PAAA CBT

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## ■ External Regulation

- General Accounting Office recent report still pursuing external regulation
- If External Regulation (OSHA) applied - PAAA enforcement is eliminated

# Insufficient Limited Approach Boundary





# Access to Electrical Breakers is Blocked





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- **Electrical Safety and Radiological Interfaces**
  - Electrical Equipment Safety Limited Approach Boundary vs. Radiological Boundary.
  - Storing Radiological Material in areas that may require emergency access; e.g., electrical breaker panels.
  
- **Other ESH and Radiological Interfaces**
  - Issue RAR for radiological issues in Tier 1 inspections.

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- Industrial health & safety regulations under PAAA (DOE O 440.1A)
  - Industrial hygiene
  - Construction safety
  - Electrical safety
  - Confined spaces
  - Fire protection
  - Etc.

# Loss of LOTO Key Control

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# Mixing Tags—Is it Safe or Dangerous?

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# Access Door Not Locked and Energized

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